

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

**FILED**  
MAR 2 2023  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY AD DEPUTY CLERK

**ODIS JONES,**  
**Plaintiff,**

**v.**

**CITY OF HUTTO,**  
**Defendant.**

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**1:20-CV-1210-ML**

**VERDICT FORM**

**QUESTION ONE**

Did the City of Hutto deny Mr. Jones his right to make and enforce his contracts with the City?

Answer "Yes" or "No."

Answer: YES

*If you answered "Yes" to Question 1, please proceed to Question 2.*

*If you answered "No" to Question 1, proceed to Question 4.*

**QUESTION TWO**

Was Mr. Jones's race, Black, a determinative factor for the City of Hutto's denial of Jones's right to make and enforce contracts with the City?

Answer "Yes" or "No."

Answer: YES

*If you answered "Yes" to Question 2, then proceed to answer Questions 3.*

*If you answered "No" to either Question 1 or 2, do not answer Question 3, and please proceed to Question 4.*

**QUESTION THREE**

What sum of money, if paid now in cash, would fairly and reasonably compensate Mr. Jones for his damages, if any, that were proximately caused by the City of Hutto's denial of his rights?

Answer in dollars and cents, for damages, if any.

Answer: \$ 8,000,000.00

*Please proceed to Question 4.*

**QUESTIONS FOUR A, B & C**

(A) Did the City of Hutto breach the Separation Agreement by failing to perform one or more obligations it made to Mr. Jones under the contract?

Answer: "Yes" or "No."

Answer: YES

(B) Was City of Hutto's breach excused by a failure by Mr. Jones to comply with a material obligation of the same agreement?

Answer "Yes" or "No."

Answer: NO

Answer subpart (C) only if you answered "Yes" to subpart (A) and "No" to subpart (B).

(C) What sum of money, if any, if paid now in cash, would fairly and reasonably compensate Mr. Jones for his damages, if any, that resulted from such failure to comply?

Answer separately in dollars and cents for damages, if any.

Answer: \$ 4,500,000.00

*This is the end of the questions. Please proceed to the last page and sign your Verdict Form.*

**VERDICT OF THE JURY**

We, the jury, unanimously answered the preceding questions by a preponderance of the evidence as instructed.

Submitted this 2<sup>nd</sup> day of March 2023.

